

EXHIBIT 1

Proposed Order

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
Nashville Division**

L.W., by and through her parents and next friends, Samantha Williams and Brian Williams; SAMANTHA WILLIAMS; BRIAN WILLIAMS; JOHN DOE, by and through his parents and next friends, Jane Doe and James Doe; JANE DOE; JAMES DOE; RYAN ROE, by and through his parent and next friend, Rebecca Roe; REBECCA ROE; and SUSAN N. LACY, on behalf of herself and her patients,

Plaintiffs,

v.

JONATHAN SKRMETTI, in his official capacity as the Tennessee Attorney General and Reporter; TENNESSEE DEPARTMENT OF HEALTH; RALPH ALVARADO, in his official capacity as the Commissioner of the Tennessee Department of Health; TENNESSEE BOARD OF MEDICAL EXAMINERS; MELANIE BLAKE, in her official capacity as the President of the Tennessee Board of Medical Examiners; STEPHEN LOYD, in his official capacity as Vice President of the Tennessee Board of Medical Examiners; RANDALL E. PEARSON, PHYLLIS E. MILLER, SAMANTHA MCLERRAN, KEITH G. ANDERSON, DEBORAH CHRISTIANSEN, JOHN W. HALE, JOHN J. MCGRAW, ROBERT ELLIS, JAMES DIAZ-BARRIGA, and JENNIFER CLAXTON, in their official capacities as members of the Tennessee Board of Medical Examiners; and LOGAN GRANT, in his official capacity as the Executive Director of the Tennessee Health Facilities Commission,

Defendants.

Civil Action No. 3:23-cv-00376

**[PROPOSED] ORDER AUTHORIZING MOVANTS TO PROCEED
PSEUDONYMOUSLY**

This matter came before the court on Movants' motion for permission to proceed in this action under the pseudonyms "John Doe," "Jane Doe," "James Doe," "Ryan Roe," and "Rebecca Roe."

The Court, having considered Movants' motion, Movants' supporting memorandum, and the entire record in this case, and having considered Defendants' opposition thereto, finds there is good cause to grant Movants' motion and hereby **ORDERS:**

1. Movants may proceed in this action under the pseudonyms "John Doe," "Jane Doe," "James Doe," "Ryan Roe," and "Rebecca Roe."

2. Movants' counsel shall disclose Movants' true names and, to the extent otherwise discoverable under the Federal Rules of Civil Procedure, other information that identifies Movants or Movants' family members, directly or indirectly ("Identifying Information"), upon request to Defendants' counsel and the Court.

3. All publicly-filed documents shall identify Movants only by Movants' pseudonyms.

4. All documents filed with the Court that contain Movants' name or Identifying Information shall be redacted.

5. Defendants' counsel may disclose Identifying Information to Defendants, Defendants' employees, and experts retained in this action, but only to the minimum extent necessary to litigate this action.

6. Individuals to whom Identifying Information is disclosed shall not further disclose that information to any other person without first obtaining written confirmation from Movants' counsel that such disclosure is necessary to litigate this action.

7. Under no circumstances shall any person disclose Identifying Information to the media without the express written consent of Movants' counsel.

8. Before disclosing Identifying Information to any person for purposes of litigating this action, Defendants' counsel shall give that person a copy of this order, require that person to read this order, specifically point out to that person the provisions of section 6 and 7 of this order, and specifically warn that person that violation of this order may result in sanctions for contempt of court.

9. If any specific issues related to non-disclosure of Identifying Information arise during the course of litigation, the parties shall seek to resolve those issues without court intervention. If the parties cannot agree, they shall seek further clarification from this Court.

[Magistrate] [District] Judge